

October 10, 2017

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
c/o Marlene H. Dortch, Secretary

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Carr, Commissioner Rosenworcel, and Ms. Dortch,

On behalf of Andale High School, located in Andale, Kansas I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. Our auditorium provides approximately 10 performances per year to an average audience size of 300 audience members each performance. These education programs are for students from elementary age through high school and serve approximately 1,500 students.

As director of theatre for our high school, I strongly support the Commission's proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

School theatre programs and professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while limiting significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to educational theatre, both in the training and safety of students, onstage and backstage.

Please provide the following information in narrative form as completely as you can. Please tell the story of your organization's use of wireless microphones and the importance of wireless devices to your operations:

We have a wireless microphone system in our auditorium that is used for play productions, music performances and speaker presentations. Our system is an ETA and operates in the 614 MHz to 698 MHz range. We have 14 Shure wireless microphones. We feel very lucky to have the wireless system we have; it was installed when our auditorium was built seven years ago. If we will be required to quit using our system, it most likely will be cost prohibitive for us to replace it. The estimated cost is about \$18,000. Our school district does not have the funds to do this.

I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

Besides education, school theatre programs provide demonstrable service to their individual communities, serving as a hub for entertainment, dialogue, and affirmation of student achievement and growth in important 21st century skills, such as creativity and collaboration. They also contribute to local economies in every community across this country. I respectfully endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate schools and performing arts organizations that use fewer than 50 wireless microphones. The proposal is a much-needed solution that benefits the arts community and the public as well as the many new and emerging unlicensed white space technologies.

Sincerely,

Janet Rhoads
Director of Theatre
Andale High School